

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION

UNITED STATES OF AMERICA,	)	CASE NO: 822-CR-702
	)	
v.	)	
	)	MOTION TO FILE UNDER SEAL
JONATHAN TRENT PATTERSON,	)	
DEFENDANT.	)	
_____	)	

NOW COMES the Defendant, Jonathan Trent Patterson, by and through his undersigned counsel, William G. Yarborough III, and would respectfully move this Honorable Court allow the Defendant to file under seal the Variance Motion in anticipation of the sentencing of the Defendant in this case.

The purpose of counsel's request is to protect the privacy interests of the persons involved. The motion(s) counsel will be filing contain information that is subject to the Standing Order Governing Discovery that the Court previously entered at ECF No. 38.

Counsel respectfully submits that the privacy interests of the individuals involved and the need to protect their safety trumps the public's limited interest in access to materials related to this case.

Counsel notes that the Court has the inherent authority to seal these documents. *See Baltimore Sun v. Goetz*, 886 F.2d 60 (4th Cir. 1988); and *In re Application of the United States for an Order Pursuant to 18 U.S.C. Section 2703(D)*, 707 F.3d 283 (4th Cir. 2013).

Counsel therefore respectfully requests that the Court allow counsel to file its Variance motion under seal. Counsel will provide copies of the sealed filing to the Government.

Respectfully Submitted,

s/William G. Yarborough  
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October 4, 2023  
Anderson, SC